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June 6, 2024

**BY ECF**

The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

*Jane Doe 1, et al. v. Palpung Thubten Chöling,*  
*f/k/a Kagyu Thubten Chöling*, Civ. A. No. 23-10117

Dear Judge Román:

My firm represents Defendant Palpung Thubten Chöling, f/k/a Kagyu Thubten Chöling (“PTC”). We write with the consent of counsel for Plaintiffs Jane Doe 1, Jane Doe 2, and Jane Doe 3 (together, “Plaintiffs”) pursuant to this Court’s March 11, 2024, Order, which at the parties’ request stayed proceedings through June 6, 2024, to allow for settlement discussions and directed the parties to submit at that time a joint status report on the progress of those settlement discussions.

Since March 11, counsel for the parties have met and conferred on several occasions to negotiate the parameters and logistics of mediation, as well as to discuss substantive matters relevant to settlement negotiations. Because the parties have jointly identified a preferred (and available) mediator and are continuing to meet and confer as to other matters relevant to the mediation, the parties request an additional ninety (90) day stay of proceedings, until September 4, 2024, in order to facilitate ongoing settlement discussions.

There has been one previous request to stay proceedings and, currently, there is no scheduling order in place, nor has a preliminary conference been scheduled. (There has also been one previous request for an extension of PTC’s time to respond to Plaintiff’s Complaint to March 8, 2024, which was granted.) The parties respectfully submit that a stay of this length is necessary because of the complexities of this matter, which involves multiple individual Plaintiffs living in separate locations across the United States, as well as allegations going back to the 1980s and in some instances earlier.

MEMO ENDORSED



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Accordingly, the parties jointly respectfully ask the Court to stay the proceedings for an additional ninety days, up to and including September 4, 2024.

We thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads 'Michael S. Vogel'.

Michael S. Vogel

cc: All counsel of record (by ECF)

**The parties' request is GRANTED. All proceedings are stayed until September 4, 2024. The Parties are directed to submit a joint status report on the progress of settlement on September 4, 2024. Alternatively, if settlement is reached, the parties shall notify the Court in writing by that date. The Clerk of the Court is directed to terminate the motion at ECF No. 22.**

**Dated: June 7, 2024  
White Plains, NY**

**SO ORDERED:**

A handwritten signature in black ink, likely of Nelson S. Roman, written over a horizontal line.

**HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE**